

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

THIS DOCUMENT RELATES TO:

Economic Loss Plaintiff Jo Ann Hamel

MDL NO. 2875

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF JO ANN HAMEL**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva") will take the deposition upon oral examination of Jo Ann Hamel, on **December 28, 2021, at 9:00 a.m. PST** and continuing until completion, **via remote deposition**. The deposition will be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. Remote access using audio-visual conference technology will be available to permit counsel for the parties to participate from various, separate locations.

Additionally, in accordance with paragraph B(1) of C.M.O. 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the deposition. //

Date: December 13, 2021

Respectfully submitted,

/s/ Tiffany M. Andras

Tiffany M. Andras  
GREENBERG TRAURIG, LLP  
77 W. Wacker Dr., Suite 3100  
Chicago, IL 60601  
Telephone: (312) 456-8400  
E-mail: [andrast@gtlaw.com](mailto:andrast@gtlaw.com)

*Attorney for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis  
LLC, and Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of December 2021, I caused a true and correct copy of the foregoing Second Amended Notice of Videotaped Deposition of Jo Ann Hamel to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on the Plaintiff's counsel by e-mail at d.stanoch@kanner-law.com, stacy@bartonburrows.com, bquestad@slackdavis.com with a copy served on all parties via MDL Centrality, on December 13, 2021. Per agreement by the parties, Plaintiff's counsel has agreed to serve a copy of the foregoing on Jo Ann Hamel via e-mail.

This 13th day of December 2021.

/s/ Tiffany M. Andras

*Attorney for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis  
LLC, and Actavis Pharma, Inc.*